

1 EMILY J. KINGSTON (State Bar No. 184752)
E-Mail: *ekingston@sideman.com*
2 JAY R. WEILL (State Bar No. 75434)
E-Mail: *jweill@sideman.com*
3 ANDREW R. J. MUIR (State Bar No. 284817)
E-Mail: *amuir@sideman.com*
4 SIDEMAN & BANCROFT LLP
One Embarcadero Center, Twenty-Second Floor
5 San Francisco, California 94111-3711
Telephone: (415) 392-1960
6 Facsimile: (415) 392-0827

7 Attorneys for Yaowapha Ritdet

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10 UNITED STATES OF AMERICA,

Case No. CASE NO. CR 14-215 EMC

11 Plaintiff,

**STIPULATION TO EXTEND FILING
DATE OF YAOWAPHA RITDET'S
REPLY TO GOVERNMENT'S
OPPOSITION TO MOTION TO
SUPPRESS AND ~~[PROPOSED]~~ ORDER
THEREON**

12 v.

13 YAOWAPHA RITDET AND STEVE
14 WALTER,

15 Defendants.

16 On February 16, 2016, in response to a Stipulation filed by the parties, the Court extended
17 the hearing date on Defendant Yaowapha Ritdet's Motion to Suppress to March 23, 2016. On
18 February 24, 2016, the parties filed a Stipulation For Limited Unsealing of Search Warrant
19 Documents and [Proposed] Order, which was granted by the Court on February 25, 2016. This
20 Stipulation was filed in order to allow the Government to provide to Ms. Ritdet and Mr. Walter the
21 search warrants, applications and affidavits as to the searches of the two restaurants owned by Ms.
22 Ritdet and the personal residence of Ms. Ritdet and her husband, co-Defendant, Steve Walter.

23 In order to give Ms. Ritdet and her counsel sufficient time in which to receive and review
24 the documents anticipated to be provided by the Government that which are relevant to the Motion
25 to Suppress, the parties have agreed, and respectfully request that the Court order, to extend the
26 due date for the filing of Ms. Ritdet's Reply to the Government's Opposition to the Motion to
27 Suppress by one week to March 9, 2016 at 2:30 p.m. before the Honorable Edward M. Chen.

LAW OFFICES
SIDEMAN & BANCROFT LLP
 ONE EMBARCADERO CENTER, 22ND FLOOR
 SAN FRANCISCO, CALIFORNIA 94111-3711

The Parties in the above-captioned case agree and jointly request:

1. That the date currently set for the filing of Ms. Ritdet's Reply to the Government's Opposition to Motion to Suppress currently due on Wednesday, March 2, 2016, be extended to Wednesday, March 9, 2016;

2. That the current hearing date on the Motion to Suppress, March 23, 2016, at 2:30 p.m. before the Honorable Edward M. Chen be maintained; and

3. That, to the extent necessary, the period of delay from March 2, 2016 through March 9, 2016, be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (h)(7)(B)(iv), as the ends of justice served by this extension allow for effective preparation, continuity of counsel and adequate trial preparation, which outweigh the best interests of the public and the Defendants in a speedy trial.

DATED: February 25, 2016

Respectfully submitted,

SIDEMAN & BANCROFT LLP

By: /s/EMILY J. KINGSTON

EMILY J. KINGSTON

JAY R. WEILL

ANDREW R. J. MUIR

Attorneys for Defendant Yaowapha Ritdet

DATED: February 25, 2016

BRIAN STRETCH

Acting United States Attorney

By: /s/JOSE A. OLIVERA

JOSE A. OLIVERA

Assistant United States Attorney

Tax Division

Attorney for Plaintiff United States of America

1 DATED: February 25, 2016

Wolf, Pennella & Stevens, LLP

2
3 By: /s/ADAM PENELLA

ADAM PENELLA

4 JAMES STEVENS

Attorneys for Defendant Steve Walter

5
6 ORDER

7 For the reasons stated by the parties in their Stipulation, the Court finds that the ends of
8 justice are served by:

9 1. Extending the filing date for Yaowapha Ritdet's Reply to the Government's
10 Opposition to her Motion to Suppress from March 2, 2016, to March 9, 2016, to allow Ms. Ritdet
11 and her counsel sufficient time to receive and review documents to be provided by the
12 Government relevant to the Motion to Suppress pursuant to this Court's order dated February 25,
13 2016, and effective preparation, continuity of counsel and adequate trial preparation;

14 2. Maintaining the current hearing date on the Motion to Suppress, March 23, 2016 at
15 2:30 (or as soon thereafter as Adam Penella, counsel for Steve Walter, can arrive following the
16 conclusion of his appearance for a Status Conference in front of the Honorable Judge Charles R.
17 Breyer scheduled to commence at 2:00 p.m. on March 23, 2016); and

18 3. Excluding the period of delay from March 2, 2016 through March 9, 2016, as
19 necessary, in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§3161(h)(7)(A)
20 and (h)(7)(B)(iv), as the ends of justice served by this exclusion allow for effective preparation,
21 continuity of counsel and adequate trial preparation, which outweigh the best interests of the
22 public and the Defendants in a speedy trial.

23 IT IS HEREBY ORDERED that the due date for the filing of Ms. Ritdet's Reply to the
24 Government's Opposition to her Motion to Suppress shall be moved to March 9, 2016.

25 IT IS FURTHER HEREBY ORDERED that the current hearing date on Ms. Ritdet's
26 Motion to Suppress, March 23, 2016, shall be maintained.

27 IT IS FINALLY HEREBY ORDERED that the period of delay from March 2, 2016 to
28 March 9, 2016, shall be excluded as necessary in accordance with the provisions of the Speedy

1 Trial Act, 18 U.S.C. §§3161(h)(7)(A) and (h)(7)(B)(iv), as the ends of justice served by this
2 exclusion allow for effective preparation, continuity of counsel and adequate trial preparation,
3 which outweigh the best interests of the public and the Defendants in a speedy trial.

4 DATED: February 26, 2016



JUDGE EDWARD M. CHEN

7 8425-1\2798809v1

LAW OFFICES
SIDEMAN & BANCROFT LLP
ONE EMBARCADERO CENTER, 22ND FLOOR
SAN FRANCISCO, CALIFORNIA 94111-3711